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**Attorneys for Defendants David Lawrence,**  
**Eric Laning, and Safety and Ecology Corporation**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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PAUL C. BACHEMIN, KATHERINE C.  
THACKER, and JAASON M. WATSON,

Plaintiffs,

-vs-

DAVID LAWRENCE, ERIC LANING,  
and SAFETY AND ECOLOGY  
CORPORATION,

Defendants.

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CASE NO.

ELECTRONICALLY FILED

**F.R.C.P. 7.1 STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel of record for Defendants, David Lawrence, Eric Laning and Safety and Ecology Corporation ("SEC"), hereby states that SEC is a Nevada corporation which is wholly owned by Safety & Ecology Holdings Corporation. Safety & Ecology Holdings Corporation is wholly owned by Homeland Security Capital Corporation ("HSCC"). More than 10% of HSCC is publicly owned.

NORRIS, McLAUGHLIN & MARCUS, P.A.  
Attorneys for Defendants

By: s/ Patrick T. Collins

Dated: October 7, 2011